

March 10, 2003

Jim Wiltsee
Herff Jones, Inc.-Fine Papers Division
4501 West 62nd Street
Indianapolis, Indiana 46268

Dear Mr. Wiltsee:

Re: Exempt Construction and Operation Status,
097-14963-00411

The application from Herff Jones, Inc.-Fine Papers Division, received on September 13, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following printer of diplomas, announcements, and other products printed on fine paper, to be located at 7601 East 88th Place, Indianapolis, Indiana 46256, is classified as exempt from air pollution permit requirements:

- (a) Sixteen (16) Heidelberg Windmill panel presses, identified as P1 to P16.
- (b) Four (4) Kluge panel presses, identified as P17 to P20.
- (c) Twenty (20) Heidelberg Windmill foil presses, identified as F1 to F20.
- (d) Twenty (20) Cronite Carver die stamp presses, identified as DS1 to DS20.
- (e) Thirteen (13) Heidelberg offset presses, identified as OS1 to OS13.
- (f) Four (4) Heidelberg folders, identified as B1 to B4.
- (g) One (1) die photodeveloping comp room.
- (h) Ten (10) natural gas fired space heaters, identified as SH1 to SH10, with a combined maximum heat input rate of 5 million Btu per hour (MMBtu/hr) total, and exhausting to SH1 to SH10.

The following conditions shall be applicable:

- (a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

- (b) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a coating line may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by John B. Chavez
John B. Chavez, Administrator

aco

cc: File, Marion County
Air Compliance, Matt Mosier
IDEM, Mindy Hahn
Permits, Angelique Oliger

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Indianapolis Office of Environmental Services**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Herff Jones, Inc. - Fine Papers Division
Source Location:	4501 West 62 nd Street, Indianapolis, Indiana 46268
County:	Marion
SIC Code:	2752
Exemption No.:	097-14963-00411
Permit Reviewer:	Angelique Oliger

The Office of Air Quality (OAQ) has reviewed an application from Herff Jones, Inc. - Fine Papers Division relating to the construction and operation of this printer of diplomas, announcements, and other products printed on fine paper.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Sixteen (16) Heidelberg Windmill panel presses, identified as P1 to P16.
- (b) Four (4) Kluge panel presses, identified as P17 to P20.
- (c) Twenty (20) Heidelberg Windmill foil presses, identified as F1 to F20.
- (d) Twenty (20) Cronite Carver die stamp presses, identified as DS1 to DS20.
- (e) Thirteen (13) Heidelberg offset presses, identified as OS1 to OS13.
- (f) Four (4) Heidelberg folders, identified as B1 to B4.
- (g) One (1) die photodeveloping comp room.
- (h) Ten (10) natural gas fired space heaters, identified as SH1 to SH10, with a combined maximum heat input rate of 5 million Btu per hour (MMBtu/hr) total, and exhausting to SH1 to SH10.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SH1 to SH10	Space Heaters	20	N/A	N/A	N/A

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on September 13, 2001.

Emission Calculations

See Appendix A (two pages) of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.300
PM-10	0.300
SO ₂	0.0131
VOC	8.8448
CO	1.8396
NO _x	2.19
HAPs	1.1492

HAP's	Potential To Emit (tons/year)
glycol ether	0.4185
xylene	0.0459
toluene	0.0583
methanol	0.4765
hydroquinone	0.1500
TOTAL	1.1492

- (a) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and

volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.2
PM-10	0.2
SO ₂	0.01
VOC	0.58
CO	1.9
NO _x	2.3
HAPs	0.35

HAP's	Potential To Emit (tons/year)
glycol ether	0.13
xylene	0.01
toluene	0.02
methanol	0.14
hydroquinone	0.05
TOTAL	0.35

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	maintenance
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.300
PM10	0.300
SO ₂	0.0131
VOC	8.8448
CO	1.8396
NO _x	2.19
Single HAP	0.4765
Combination HAPs	1.1492

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (1) Because this source does not use rotogravure printing, 40 CFR Part 60 Subpart QQ does not apply to the facility.
 - (2) Because the maximum design heat input capacity for the natural gas fired space heaters, identified as SH1 to SH10, are not boilers, they are not subject to 40 CFR 60, Subpart Dc.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source. Because this source is not a major source of hazardous air pollutants (HAPs), as defined in 40 CFR Part 63.2, 40 CFR Part 63 Subpart KK (National Emissions Standards for the Printing and Publishing Industry) and 40 CFR Part 63 Subpart JJJJ (National Emissions Standard for Paper and Other Web Surface Coating Operations) do not apply to the facility.

State Rule Applicability - Entire Source

326 IAC 1-6 (Preventive Maintenance Plan)

This source is not subject to 326 IAC 1-6, because it is not required to obtain a permit under 326 IAC 2.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1, because it is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

326 IAC 2-6 (Emission Reporting)

This source is located in Marion County and its potential to emit any regulated pollutant is less than ten (10) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The natural gas fired space heaters, identified as SH1 to SH10, are not subject to the provisions of 326 IAC 6-2-1(d) because they are not sources of indirect heating.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This rule does not apply to this source because the potential to emit of each individual unit is less than 25 tons per year or 10 pounds per hour of Sulfur Dioxide.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Herff Jones, Inc. - Fine Papers Division has no facility with potential to emit more than twenty-five (25) tons per year of VOCs. Therefore, 8-1-6 does not apply.

326 IAC 8-2-5 (Paper Coating Operations)

This source is subject to 326 IAC 8-2-5 (Paper Coating Operations) because it involves saturation processes of paper. Pursuant to this rule, no owner or operator of a coating line may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.

326 IAC 8-5-5 (Graphic Arts Operations)

This source has the potential to emit less than twenty-five (25) tons per year of VOCs. Therefore, 8-5-5 does not apply.

Conclusion

The construction and operation of this printer of diplomas, announcements, and other products printed on fine paper shall be exempt from air pollution control permit requirements.

**Appendix A: Emission Calculations
Miscellaneous Processes**

Page 1 of 2 TSD App A

Company Name: Herff Jones, Inc. - Fine Papers Division
Address City IN Zip: 4501 West 62nd Street, Indianapolis, Indiana 46268
Exemption: 097-14693-00411
Reviewer: Angelique Oliger
Date: 02/11/03

	Weight % VOC	Annual Usage (lbs)	Annual lbs VOC	Annual tons VOC	HAPs Weight % glycol ether	Weight % xylene	Weight % toluene	Weight % methanol	Weight % hydroquin	Annual lbs glycol ether	Annual lbs xylene	Annual lbs toluene	Annual lbs methanol	Annual lbs hydroquin	Annual tons glycol ether	Annual tons xylene	Annual tons toluene	Annual tons methanol	Annual tons hydroquinone
Presses																			
ink	3.4	6593.333	224.1733	0.112087	4	0	0	0	4.55	263.7333	0	0	0	299.9967	0.131867	0	0	0	0.149998
blanket wash/cleanup	100	833.3333	833.3333	0.416667	0	0	14	0	0	0	0	116.6667	0	0	0	0	0.058333	0	0
solvent/thinner	100	283.3333	283.3333	0.141667	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
glue	87	646.6667	562.6	0.2813	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bindery																			
denatured ethanol solution	60	23823.33	14294	7.147	0	0	0	4	0	0	0	0	952.9333	0	0	0	0	0.476467	0
Comp Room																			
developer	10	6296.667	629.6667	0.314833	5	0	0	0	0	314.8333	0	0	0	0	0.157417	0	0	0	0
developer/finisher	6	8616.667	517	0.2585	3	0	0	0	0	258.5	0	0	0	0	0.12925	0	0	0	0
miscellaneous chemicals	100	113.3333	113.3333	0.056667	0	81	0	0	0	0	91.8	0	0	0	0	0.0459	0	0	0
TOTAL				8.72872 tons/year of VOCs											0.418533	0.0459	0.058333	0.476467	0.149998
																		1.149232 tons/year of HAPs	

**Appendix A: Emission Calculations
Natural Gas Combustion Only**

Page 2 of 2 TSD App A

Company Name: Herff Jones, Inc. - Fine Papers Division
Address City IN Zip: 4501 West 62nd Street, Indianapolis, Indiana 46268
Exemption: 097-14693-00411
Reviewer: Angelique Oliger
Date: 02/11/03

Heat Input Capacity	(MMBtu/hr)	Natural Gas
		Potential Throughput
		(MMCF/yr)
TOTAL	5.0	43.8

	Pollutant					
Emission Factor in lb/MMCF	PM 13.7	PM10 13.7	SO2 0.6	NOx 100.0	VOC 5.3	CO 84.0
Potential Emission in tons/yr	0.3000	0.3000	0.0131	2.1900	0.1161	1.8396

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton